

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 3-09-CR-206-K
	§	
EUGENIO D. LEO (1)	§	
JODY L. MEYER (2)	§	

UNITED STATES' MOTION FOR RECIPROCAL DISCOVERY

The United States of America, through the United States Attorney for the Northern District of Texas, files this Motion for Reciprocal Discovery pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure. The government has complied with its discovery obligations under Rule 16, as well as other rules and caselaw. In fact, the government provided extensive discovery to the defendants in August 2009. This discovery even included Jencks documents, normally not turned over until the eve of trial.

The government now requests reciprocal discovery under Rule 16(b)(1)(A), (B), and (C). Defense counsel may have had contact with one or more of the foreign witnesses scheduled to be deposed this month. If the defendants are in possession of witness statements, oral or written, this information may be relevant and responsive to the government's motion.

Because all parties are taking foreign depositions beginning on November 16, 2010, the government requests that reciprocal discovery be provided by November 10,

2010, thus providing the government with enough time to make use of it at the trial depositions.

Respectfully submitted,

JAMES T. JACKS
UNITED STATES ATTORNEY

/s/ Dayle Elieson
DAYLE ELIESON
Assistant United States Attorney
Texas Bar No. 00790639
1100 Commerce Street, Third Floor
Dallas, Texas 75242
Telephone: 214.659.8600
Facsimile: 214.767.2846
Email: dayle.elieson@usdoj.gov

Certificate of Conference

On November 3, 2010, counsel of record for the defendants has been contacted for their position on this motion. Leo, through counsel Mick Mickelsen, is not opposed. Meyer, through counsel Larry Brown, was unable to be reached for his position.

/s/ Dayle Elieson
Dayle Elieson
Assistant United States Attorney

Certificate of Service

On November 3, 2010, I certify that a true and correct copy of the foregoing document was served on all parties of record by electronically filing it with the Clerk of the Court for the United States District Court, Northern District of Texas.

/s/ Dayle Elieson
Dayle Elieson
Assistant United States Attorney